

**Australian Technology Network of Universities (ATN) response to  
*Setting and Monitoring Academic Standards for Australian Higher Education': a discussion paper***

As a group of universities committed to the improvement of higher education and the further strengthening of quality management of Australian universities as self accrediting bodies, the **Australian Technology Network of Universities (ATN)** welcomes the opportunity to respond to the Australian Universities Quality Agency (AUQA) discussion paper '*Setting and Monitoring Academic Standards for Australian Higher Education*'.

The ATN supports the need for Australian universities to more explicitly focus on what academic standards mean to them, to strengthen their systems and process for setting and assuring such standards, including benchmarking against relevant national and international reference points. It is important for the academic standards to be more clearly articulated and monitored by self-accrediting bodies, informed by relevant frameworks that indicate what matters and how they will know that higher education courses of appropriate standing are offered.

It should be noted that at a macro level the standards of Australian universities are already defined by their compliance with the National Protocols. Furthermore the minimum standards for professional practice are set by the accrediting processes of many professional bodies. Arguably the role of AUQA/TEQSA is not to set minimum disciplinary standards but is to encourage universities in the continuous improvement of quality over and above these minima. This continuous improvement should not be in a standardised national format but should be related to the distinctive mission of the institution. Many Australian universities already have well-developed graduate outcomes which they assess in a number of ways including graduate destinations and graduate surveys. A rigid system of national disciplinary standards confuses the issues of minimum standards with continuous improvement, which could potentially ossify innovation and diversity within the sector.

The ATN also supports the collegial approach to academic standards emphasised in the discussion paper. The underlying role of academic staff engaged in academic debate, innovation and knowledge advancement is at the heart of academic standards. It is also fundamental to the role of universities as self-accrediting bodies, where academic input and peer review is a key element of setting, evolving and monitoring academic standards. An essential element of this is the recognition (and facilitation) of differences both within and across disciplines.

The ATN has been proactive in strengthening systems and process for setting and assuring such standards through its own development of an academic standards framework, which has been used across the ATN to allow each member institution to benchmark its local approach to academic standards and the policy and processes used and outcomes achieved. This high level framework approach, which complements the similar work undertaken by AUQA, has proven to be very useful in improving the articulation and more systematic recognition and monitoring of academic standards within the ATN.

However, the ATN has significant concerns as to whether the proposal of AUQA to now consider a national structure for Academic Achievement Standards, as set out in the discussion paper '*Setting and*

*Monitoring Academic Standards for Australian Higher Education*, is a viable and useful further development step. These concerns fall into two broad categories; whether the proposal;

- a) Will actually advance the important issues identified above, and
- b) Even if can be argued to do so, can it be implemented and/or achieve outcomes that will be usable.

This submission will provide broad comments against these two key issues, noting that individual ATN members have specific views on questions raised by the paper and may make their own submissions.

### **Will the proposal advance the strengthening of Academic Standards?**

The ATN has two major concerns about the proposal; first, that it gives undue emphasis to only one element of academic standards, and second, that it focuses too strongly on standardisation as opposed to standards. Either of these emphases, but particularly in combination, will not in our view advance the management of academic standards in Australia.

Academic Achievement Standards are one element of Academic Standards, as the AUQA and ATN frameworks make clear. The levels of academic achievement obtained by graduates are no doubt one important outcome measure of higher education. However, Academic Achievement Standards are a very narrow area to focus upon at a key area of national importance. In the end, they are a product of the quality and standards of the higher education system and of the ability and aptitude of the students. It is the broader context of Academic Standards for the former that should be the focus of AUQA and of Australia Universities. This is correctly the focus of the AUQA and ATN Academic Standards frameworks.

Focusing on the broader context gives attention to what are actually the key issues for Academic Standards; such as the standard of curriculum, knowledge and generic skills minimum expectations, adequacy of assessment structures and consistency of outcomes and quality of learning delivery and support mechanisms. These are larger issues and more important for focus than the very narrow outcome issue of Academic Achievement Standards. We acknowledge that greater understanding of Academic Achievement Standards would inform development of these matters, but to focus on the latter at the expense of the former would not be productive for Australian higher education.

The concerns raised by the narrow focus on Academic Achievement Standards are heightened by the theme of standardisation that pervades the proposal. A tone of standardised measurement and the identification of nationally specified standards of outcomes for all courses in a broad field, regardless of the different education approach and goals, pervade the proposal. This is probably the tone required for the nature of the proposal being put, which is our essential concern. Adopting this proposal would inevitably lead to excessive standardisation of curriculum, assessment, etc across Australia, to the great detriment of the diversity that currently exists, which adds significant value to the sector and is vital for a vibrant and strong higher education system.

This focus on a national approach is also potentially damaging in other ways. Disciplinary knowledge is not confined within national boundaries; the knowledge economy is global. The use of national frames of reference could not only provide damaging standardisation within country but also damaging isolation from international networks and processes.

Collegial processes of debate about academic standards do not necessarily lead to totally common understandings about what the minimum or base expectations are; nor should they. They often quite validly lead to differences which result in innovation and progression for curriculum, assessment and value adding diversity of graduate outcomes. This is a key feature of the self accrediting status of Australian universities and one that should be protected and strengthened. The debate and approach to date on academic standards has done so. Unfortunately, the ATN thinks that the current proposal may move the debate and outcomes in a different direction. We acknowledge that the proposal indicates an awareness of such issues and indicates that the outcomes sought would seek to avoid such standardisation outcomes. However, we think that AUQA significantly underestimates the difficulty in doing so, given the strong inherent standardisation tendency in the approach proposed.

### **Can the proposal be implemented and/or achieve outcomes that will be usable?**

The definition of Academic Achievement Standards presented is reasonable and takes an appropriate view of standards in this context. It is correct, as indicated in our opening comments, that these matters should be explored through collegial academic processes. This is the hallmark of university academic management processes. Also, where appropriate other key stakeholders, such as industry and the professions, should be involved. The ATN institutions actively pursue this through external involvement in curriculum and graduate attributes development. It is important that individual institutions approaches to academic standards seek to address these matters.

However, it does not necessarily follow from such recognition that it is feasible or desirable to seek to nationally specify Academic Achievement Standards. The concerns about whether it is 'desirable' have been expressed in the previous section. Here we focus on whether it is feasible, and thus whether any outcomes produced would be useful.

The essence of the proposal is that the collegial academic and discipline relevant debate and specification of academic standards pursued within institutions, and which are explicitly acknowledged to be appropriate, be writ large nationally. In our view this is not practically feasible unless the focus is diluted to very broad fields and very high level notions of outcomes, and if done at such a level, will not be useful to any institution or other stakeholder.

Putting aside for the moment our significant concerns about standardisation and the stifling of diversity and innovation that would result from the proposal, it may be feasible for academics within a narrow discipline field to agree on "national statements of desired learning outcomes" for very specific elements of curriculum. For example, the accounting discipline (where professional accreditation places some constraint on diversity) might agree on desired outcomes for introductory financial statement

analysis. Even here, however, history and experience would suggest that many academics would disagree on at least some of the expected outcomes, due mainly to disagreement about what should be the education goals of specific course units.

Repeating such debate and consideration across even one discipline field for the full curriculum of any degree would be a massive undertaking. Even if it could be accomplished, it would likely be out of date by the time it was completed. Such considerations, however, can be (and routinely are) accomplished within an institution through standard academic management processes, noting that these have national reference points through academic and peer networks and professional bodies, where relevant. Also, at this institutional level appropriate consideration is given to different missions, educational goals, etc. A national level disciplinary framework of this sort would be very time-consuming and cumbersome to apply and would inhibit innovation in new disciplinary fields.

The proposal quite rightly is based on an understanding that such a detailed and intensive process of peer engagement is not feasible. In recognition of this it reverts to an approach that would be broader in terms of the discipline covered, higher level in terms of the curriculum elements and more general in terms of the “desired learning outcomes” to be considered. Even at this very high level of generality proposed, the approach would still be a massive undertaking, requiring significant investment of quite scarce national resources – our academic workforce.

However, this more ‘doable’ approach would result in:

- Greater difficulty in obtaining any consensus, as the level of consideration would not map usefully to actual curriculum;
- Significant loss of relevance, as the focus on field of study clusters would remove any useful discipline understandings that might be brought to bear;
- A focus on generic attributes and skills disengaged from the specific disciplinary context where they have meaning (it is well recognised that such matters can only validly be developed and assessed when embedded in a discipline); and
- A level of generality for learning outcomes statements that in the end it is hard to conceive as to how they would provide any meaningful reference point for any specific degree program.

The ATN thus believes that at a national level, any useful approach would not be doable and any doable approach would not be useful.

## **Recommendations**

The ATN is of the view that the current proposal will not advance the strengthening of Academic Standards in Australia, and may actually result in an unproductive diversion from the current framework process and continuous improvement initiatives being undertaken by Australian universities. These are being assisted by the existing AUQA Academic Standards framework and feedback through the Cycle 2 audits.

The ATN is particularly concerned about the inherent standardisation thrust of the proposal, which will inevitably lead to reduction in innovation and diversity in educational goals, curriculum and assessment across the sector. Even though variety at the disciplinary level is strongly acknowledged, the end outcome of such national approaches is to drive universities towards uniformity rather than diversity. Any such initiatives are particularly of concern with the current broader policy context for higher education. The Commonwealth Government reforms strongly point to the need to strengthen diversity across the sector (compacts, mission-related performance funding, freedom in discipline profile), within the context of accountability and minimum performance standards. This proposal too strongly focuses on the latter point, without significant consideration of how to best to achieve this given the policy context.

This is not to say however, that some elements of the proposal may not be useful for considering Academic Achievement Standards at an institutional level or in providing some bases for national comparison. For example, developing an agreed model for documentation of such standards could be useful, as could some of the reporting ideas set out in Section 3.

**The ATN therefore recommends** a rigorous consultation process around the responses to the proposal so that all may understand the views across the sector. Consideration of these might lead to alternatives that could have value in progressing Academic Standards in Australia. The ATN does not believe that the current proposal should be progressed any further at this time.

The ATN welcomes this contribution to the important debate about academic standards. While not endorsing this particular proposal, the ATN is happy to work with AUQA to develop constructive ways forward, which might include:

- AUQA to articulate clearly the ways in which Australian standards are already maintained e.g. through compliance with the National Protocols;
- AUQA to differentiate clearly between on the one hand minimum standards such as those set by professional bodies and on the other the aspirational standards set by individual institutions committed to continuous improvement in line with their distinctive missions;
- AUQA to identify different aspects of standards other than Academic Achievement Standards, using the ATN Standards Framework as a base.

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